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**From:** Gordon, Kevin  
**Sent:** 18 November 2020 09:25  
**To:** Gordon, Kevin  
**Subject:** EPR Appeal Hinkley Point 3rd Party Reps Jennifer Wilson

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**Sent:** 25 October 2020 20:55  
**To:** ETC <[ETC@planninginspectorate.gov.uk](mailto:ETC@planninginspectorate.gov.uk)>  
**Subject:** Inquiry on permit EPR/HP3228XT/V004: NNB Generation Company (HPC) Limited

FAO Kevin Gordon

Dear Sirs,

Re: Application from NNB Generation Company (HPC) Limited (NNB) to vary an environmental permit for Hinkley Point C Power Station

I wish to register my representations in respect of the appeal made by NNB to the Secretary of State.

As the UK is one of the most nature depleted countries in the world it is imperative that we do everything in our powers to make sure that any new infrastructure projects provide biodiversity gain.

The original DCO application to build HPC I believe was granted by the Secretary of State with considerable constraints to protect ecology of the local environment this included an Acoustic Fish Deterrent (AFD). NNB in 2013 agreed with the Environment Agency the best way to minimise fish and other marine life mortality was to install an AFD they now want to renege on an agreement already made when this licence was originally granted in 2013. Now NNB say the AFD needs to be sacrificed for diver safety even though inspection of the heads will have to be a routine process for the 60 years of the operational life of the plant which gives the opportunity to inspect the AFD at the same time. This leads one to believe that NNB have decided that an AFD is too costly and have chosen profit over the environment. This makes me question, moving forward, if NNB are allowed to renege on their original agreement regarding the AFD what other environmental issues or maybe health and safety issues will NNB attempt to sacrifice in order to maximise profit.

The original licence was granted 7 years ago and a lot has happened since then so the opportunity must be taken to totally reassess the granting of this licence considering current circumstances. This is a necessity as the affected area has now been designated a Marine Protection Area which underpins its importance to preserving biodiversity. This application to vary the

licence, provides the opportunity to have a public enquiry into the licencing of the cooling system as it will have adverse impacts on European Protected Species such as European Eels, Alis Shad, River and Sea Lamprey and Twaite as well as more common species that are part of the important food chain for marine and land-based mammals and birds. It has recently been made public that mud and sediment in the area where the pipes will be installed, and other works undertaken, is likely to contain radioactive particles and heavy metals including alpha emitting particles so this must call into question the environmental and health impacts of disturbing the sea bed. Moving forward it might be that the installation of cooling towers will have the least environmental impact or, given the many failings of NNB's European EPR, cancellation of the whole project.

If the Environment Agency allows the variation to this licence, it shows that they are not able or willing to protect the environment. If the Secretary of State allows this variation, then it ridicules the Governments statements about protecting the environment, makes a sham of the 25-year environment plan and claims that they wish to increase biodiversity.

Therefore, I believe that the variation to the licence should not be granted and request that the damage that this project will have on the marine environment if an AFD is not installed should be the subject of a public enquiry.

I have no objections to my representation being made public.

Yours faithfully,

Jennifer Wilson



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